

Before the
Federal Communications Commission
Washington, D.C. 20554

SEP 25 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

CC Docket No. 99-200

Numbering Resource Optimization

**COMMENTS OF TELCORDIA TECHNOLOGIES, INC ON THE
THOUSANDS-BLOCK POOLING ADMINISTRATOR
TECHNICAL REQUIREMENTS**

Telcordia welcomes the opportunity to submit comments on the Thousands-Block Pooling Administrator Technical Requirements document, on which the Commission has invited comment.¹ While Telcordia welcomes the opportunity to submit its comments, it has been significantly handicapped in its ability to do so.

First, although the NANC's Requirements Document on which comment has been sought refers to and incorporates by reference certain NeuStar documents,² NeuStar has refused to make one of these documents available to Telcordia, even after Telcordia was directed by Commission staff to obtain the documents from them.³ This missing data problem is only one of many difficulties that bidders other than NeuStar face if they are to compete on an even basis for the Pooling Administrator contract.

Telcordia is concerned that without access to this document which describes information necessary to scope out the parameters of the interface between the national Pooling Administrator and the NPAC, not only is Telcordia hobbled in preparing a well-informed bid,

¹ Public Notice #DA 00-2011, released September 5, 2000.

² The Technical Requirements document provides that a bidder must rely on two NeuStar documents in preparing its bid: NeuStar, Inc. NANPA Central Code Administration System (CAS), Requirements Specification, Revision 4.3s, (February 23, 2000); and NeuStar, Inc.: Methods and Procedures for National Number Pooling Prepared by NeuStar, Inc. NPAC SMS Release 3.0, prepared NeuStar, Inc. NPAC, version 0.10 (May 19, 2000).

³ See the copy of NeuStar's electronic mail response to Telcordia in Attachment

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but it also will be impossible for the FCC to ensure a level playing field for all potential bidders, as NeuStar obviously has access to the interface data that it is refusing to provide to others.

As Telcordia emphasized in its previous comments and in its Petition for Reconsideration in CC Docket 99-200, NeuStar had exclusive access to the NANC and its technical subgroup – the group that prepared the Requirements Document here – for a year and a half, and in many cases provided them the technical content now in that Requirements Document. Given this, NeuStar may “know” the intended meaning of ambiguous terms and technical specifications when no other bidder does.⁴ Under such circumstances, Telcordia urges the Commission to remain vigilant to ensure that all bidders are treated alike, or it will sacrifice the benefits of competitive bidding that it has found are in the public interest.

Second, the NANC Requirements Document is incomplete, and therefore our comments are perforce incomplete. Our detailed comments herein (see Attachment 2) seek to address those ambiguities that can be addressed, given the information that has been made available. We believe that Telcordia’s specific recommendations on how details in the Requirements may be perfected are correct and that they should be adopted, but there is a broader concern that is even more important. Any ambiguities in the resulting RFP will create the dual risks that: (1) bids will arrive that cannot be compared on an even basis, because they interpret the ambiguities differently, and (2) bidders may interpret the ambiguities in ways that are not desired by the industry and the Commission. Thus, even if the Commission does not adopt Telcordia’s specific perfecting recommendations, we urge it to resolve the issues we raise.

One ambiguity on which comment is simply not possible at this time is that the Requirements Document states that the contract is to be based on the Federal Acquisition

⁴ Indeed, with reference to NeuStar’s response to Telcordia, if NeuStar truly knows that the reference to their document by the NANC in its document was in error, this confirms our point. Telcordia and other bidders do not have such special knowledge. We can only rely on the material made available to us.

Regulations ("FAR"). As the Commission knows, the FAR are very broad and comprehensive, and encompass a broad array of potential terms and conditions. Even if it were indicated that the contract is to be "governed by" the FAR, it would be unclear without specific section references just what terms and conditions would be involved. The language here, "based on" the FAR, is even more ambiguous. Telcordia urges the Commission to clarify what FAR provisions are to apply.

Other ambiguities fall into two main categories: business rules and reporting requirements. These ambiguities are addressed in detail in Attachment 2.

Two ambiguities in the business rules that are particularly troublesome from a planning perspective are: (1) interaction with the NANC,⁵ and (2) nature of required web site.⁶ Telcordia strongly believes that the technical requirements should explicitly state such content and rules so that the effort can be properly scoped, and so that all bidders can bid on an equal basis. At minimum, areas that the NANC knows at this time are missing from the Requirements, or are not yet finalized, should at least be identified. Similarly, in the reporting requirements, there is an expectation that PA system will support a standard set of reports applicable to entities such as NANPA, service providers, NANC and regulatory agencies,⁷ but the distribution, data and schedule requirements are not specified and remain open to varying interpretations.

Both the business rules and the reporting requirements frequently reference an expected or required "alignment" of the national PA and NANPA systems. For a bidder to meet such a requirement of "alignment," it would have to possess a more thorough knowledge of these

⁵ Section 3.10 provides that the PA must "interact with the NANC during the development phase to learn customer's application content and business rules along with any other information pertinent to the seamless provision of national pooling administration." without specifying the scope and nature of this interaction.

⁶ Section 3.10 provides that the "web site and pooling administration . . . simulates the design, look and feel of the NANPA CO Code administration system." Such design, look and feel has neither been made publicly available nor reviewed publicly.

⁷ Section 2.18.2.

systems than is presently publicly available. Any references to NeuStar systems need to be fully disclosed and carefully bounded to minimize the unfair advantages that NeuStar possesses, and it needs to be made clear that relevant NeuStar documentation will be disclosed to all bidders.

And finally, as Telcordia emphasized in its previous comments and in its Petition for Reconsideration in CC Docket 99-200, the award cycle contemplated in *Numbering Resource Optimization*, 15 FCC Rcd 7574 (2000), was so short as to make it difficult for a Pooling Administrator bidder to recoup its start up costs.⁸ When we filed those comments, the contemplated period appeared to be 14-18 months, depending on the respective RFP, bidding, and award cycles for the Pooling Administrator and NANPA contracts. With the elapse of time since then, this period could be even shorter.

Start up costs are normally recovered over the term of a contract so as not to create a pricing bulge at the outset. However, the contemplated short time period could have the effect of causing a bidder to quote unnecessarily high per-year prices, if it seeks to recover all start up costs in this short time period; potentially to lose money if it sets the prices below that level and its contract is not subsequently renewed; or in the case of NeuStar, to subsidize Pooling Administrator activities with revenues from its other numbering-related activities, *i.e.*, NANPA and NPAC.

Telcordia notes that the Commission set the NANPA contract for bidding on a 5 year term, which enabled the NANPA to recover its start up costs in a reasonable fashion that did not result in unnecessarily high prices. Telcordia urges the Commission to set the Pooling Administrator award period to a comparable 5 year duration. Such a longer term would also raise the value of the contract, which may attract more bidders.

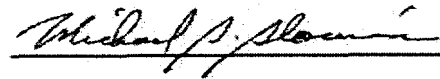
⁸ NRO Order at para. 155 ("the Commission will solicit bids for a national Pooling Administrator to serve until the completion of the current NANPA administrator term.").

In Attachment 2, Telcordia presents detailed comments and recommendations on the Technical Requirements documents, and we urge the Commission to consider them along with the foregoing general comments as it formulates its RFP.⁹

Respectfully submitted,

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⁹ In providing its comments herein, Telcordia does not waive any objections, and specifically reserves the right to object to the resulting RFP and/or bidding by NeuStar on grounds of notice, unfairness, and/or conflict of interest.

**ATTACHMENT 1: NeuStar Response to Telcordia's Request for Documents
Referenced in the Technical Requirements Document**

To: gslawsky@telcordia.com
cc: (bcc: Gary Slawsky/Telcordia)
Subject:

Gary

At the NANC meeting on Tuesday, Sept 19, you told me that you had approached the FCC and requested copies of two NeuStar documents referenced in the pooling requirements, and that the FCC had referred you to us.

Attached to this note is a copy of the requirements specification for CAS as requested.

The second document you requested is NeuStar proprietary. In our judgment, the document was referenced in the technical requirements in error, and we will make that point in our comments to be filed next week. Nonetheless, we will make a redacted version of the document available to the FCC for them to include in their final RFP. The current interface between the NPAC and the state pooling administrator is e-mail and is consistent with the specifications noted in Section 2.17.3 of the technical requirements.

Ron Conners

<<CASReqV43.doc>>



- CASReqV43.doc

ATTACHMENT 2: Detailed Telcordia Comments on the Requirements Document

Additional information is requested in some of the comments below. It is important that the requested information be provided in order to avoid different standards being used to compare responses during the evaluation of bids.

Section 1

- 1.4 The following statement requires further definition and clarification: “The Pooling Administrator must also ensure that domestic numbering administration is effective, while leveraging the expertise and innovation of industry to promote number conservation.” Telcordia recommends that this statement be removed as is it too general.
- 1.8.1; item 4 The FCC should clarify that where it has made rulings for the administration of numbering resources that are not specific to area codes or CO codes, that these directives also apply to the administration of thousand block pooling.
- 1.9 The FCC Intellectual property rights should be specified in order to provide a sound basis for accurate bids. Telcordia recommends that this statement be replaced with a requirement for a license to use for a specific purpose.

Section 2

- Introduction Telcordia recommends that copies of all reference documents be made readily available to bidders simultaneously and that all bidders be informed of the procedures for accessing these documents.
- 2.2.1 The clause “... pooling administration organization is not impacted by other functions that may be performed by the Respondent’s company.” is vague. Telcordia is a world class consulting, engineering and telecommunications software development corporation that performs many different functions. Clarification of the word “functions” as used in this section is necessary for Telcordia to accurately respond to the requirements contained in this section.
- 2.3.7 The clause “...not represent(ing) the interests of the Pooling Administrator’s parent company in any respect.” is confusing. Telcordia recommends that a representative of the parent company can be assigned to support the Pooling Administrator part time, if he/she does not simultaneously perform duties for the parent company, and confine their assistance to support provided to the PA.
- 2.7 and 2.8.1 This section does not put any parameters around the concept of “historical data.” Telcordia recommends that historical data required from the PA should be limited to data utilized by the PA in the course of performing it’s duties as the PA.

- 2.8 Telcordia recommends that the FCC specify how many times the PA should expect to be audited each year.
- 2.8.3; item 2 The following references: "...Service...", "...Service Elements fees...", and "...Updated Thousand Block Pool Administrative Response..." are ambiguous. Telcordia recommends that the FCC include additional clarification that the PA should be able to demonstrate that it is charging the industry for functionality as quoted in their bid.
- 2.14 Accurate inventory management of the pool will be dependent on the availability to the Pooling Administrator of the FCC Form 502 data and submission of the INC Appendix 1 "Thousands-Block Forecast Report" form which contains monthly forecast information. The INC is considering guidelines which require the PA to submit a Form 502 forecast to the NANPA for the pool, and requires pooling carriers to submit Form 502s to the PA simultaneous with their submission to the NANPA. The need for the PA to have a system in place to receive carrier Form 502 filings and to analyze, produce and submit a Form 502 forecast to the NANPA on behalf of the pool should be made clear.
- 2.16 This section is unclear. Initialization of reclamation procedures is the PA's responsibility but the states have actual reclamation responsibility according to FCC-00-104 paragraph 238. Telcordia recognizes that clarifications concerning this matter are ongoing, but unless clarifications are finalized in time for RFP responses, bidders will not be able to provide a response which contains accurate information.
- 2.17 The system interfaces in Figure 1 are named but not described and therefore not complete enough for Telcordia to provide an accurate response. In particular definitions of "Administrative Interface," "Information and Report Interface," and "Processing Interface," and their respective capabilities and limitations should be provided. In particular it should be clarified that the Processing Interface is the mechanical interface referenced in Section 3 below, and that the Administrative Interface is limited to the current publicly available interfaces between the PA and NANPA and the PA and NPAC. The actual interface for information and reports should be specified, for example via access to reports and other publicly available information on the PA's website.
- 2.17.1 Telcordia understands the current interface. As soon as we complete our review of the following 100 page NeuStar document: "NeuStar Central Code Administration (CAS) Requirements Specification, Revision 4.3s", which we only received on Friday, September 22, 2000, we can address any relevant issues in the reply round. Telcordia's initial analysis notes that while the document in its "Use Case IDs" probably gives the respondent enough detail to develop an adequate understanding of the "use" of the CAS for development of a PA system; without being able to see and use the screens, buttons and menus referenced, it is still impossible to develop an adequate understanding of the "look and feel" of the yet to be released CAS. One could also note that the availability for batch applications and/or EFT/FTP is not part of the CAS (only web-based applications for external users), so that requirement of the Pooling Technical Requirements

would necessarily require deviation from the look and feel of the yet to be released NeuStar CAS.

- 2.17.3 Telcordia cannot provide complete and accurate comments on this section until we are provided with access to the following NeuStar document: "Methods and Procedures for National Number Pooling Prepared by NeuStar, Inc NPAC SMS Release 3.0." Telcordia's review of the publicly available documents notes that the only interface between the NPAC and the PA noted is via e-mail. Telcordia is concerned that if the Methods and Procedures document contains information about the interface or the workings of pooling in the NPAC that are available only to NeuStar, that the unfair advantage referenced above is exacerbated.
- 2.18.2 Telcordia recommends that this section be clarified by adding that the PA will support standardized reports within 24 hours. Standardization can be accomplished by the PA alone or in collaboration with the industry.
- 2.19.2 This section omits any timeframe for response. Therefore, Telcordia recommends that the PA be expected to respond within 1 calendar week. We further recommend that the response contain a recommended time to correct any performance problems.

Section 3

- 3.1 This section does not explain what "local and NPA specific dialing requirements," referred to in the list of items the pooling administration system, will include. Further, it is not clear what the FCC envisions the PA will use these for. If the FCC or the NANC simply wants the PA to keep a listing on its website of where there is 7 or 10-digit dialing, it would not be necessary to add that as a data element to the pooling system.
- 3.1.3 As Telcordia noted regarding Section 2.17 above, the system interfaces in Figure 1 are named but not described and therefore not complete enough for Telcordia to provide an accurate response. The system interfaces in Figure 1 are named but not described and therefore not complete enough for Telcordia to provide an accurate response. The section is titled mechanized interface but there is no identification of the interfaces to be mechanized and those not to be mechanized. Telcordia recommends that EFT be interpreted to mean FTP, but request that the FCC provide clarification for this section.
- 3.1.4 This section leaves open-ended what is meant by "other industry forms/data or reports". Telcordia requests that the FCC clarify this section.
- 3.2 This section is vague in that it is not clear whether "...file transfer." is the same as EFT. Telcordia requests that the FCC confirm this interpretation. Further, the clause "...other documents..." is unclear. Telcordia requests that the FCC clarify what other documents a bidder should address.

- 3.3 This section is unclear. Telcordia requests that the FCC confirm that the Batch (EFT) processing capability is FTP.
- 3.3.1 Although Telcordia is capable of implementing the 99.9% availability requirement, such a requirement does not appear to be needed for thousands number pooling and is therefore not cost-effective. Thus, Telcordia recommends that the availability threshold be reduced.
- 3.10 This section requires the PA to provide a "...web site..." and "...pooling administration system that simulates the design, look and feel of the NANPA CO Code Administration system." Telcordia recommends that the requirement be defined in a non-vendor specific manner. If reference to the NANPA CO Code Administration is retained then Telcordia must be able to access the system for a reasonable period of time, not less than two weeks, in order to analyze and understand said design, look, and feel. Furthermore, Telcordia notes that by limiting design to the look and feel of the CAS and the NANPA website, the FCC and the industry will lose the opportunity for the respondent to develop an improved look and feel.
- The "...application content and business rules..." mentioned in this section should be defined more explicitly in the technical requirements in order to eliminate ambiguity, particularly since the previous paragraph implies there will be design and implementation meetings with the industry....after the RFP has been awarded.
- 3.11 This section does not identify the required reports. Telcordia recommends that these should be explicitly defined to enable a thorough responsive PA bid.
- 3.15.2 This section is vague about the details of the activities that need to be accomplished within the 8 seconds interval mentioned. Telcordia recommends that the FCC furnish these details in order to enable Telcordia to prepare a comprehensive response to the RFP.
- 3.15.4 This section is vague about the details of the activities that need to be accomplished within the 10 seconds interval mentioned. Telcordia recommends that the FCC furnish these details in order to enable Telcordia to prepare a comprehensive response to the RFP.
- Telcordia request that the FCC explain what constitutes a "...login ID request form..." This seems to be different than the INC User Profile Application.
- 3.15.7 Telcordia recommends that these requirements specify that previously filed data reports pertaining to the "specific user" be retained by the PA only for the term of the PA contract.
- Telcordia requests that the FCC define what constitutes "previously filed data reports". It is unclear whether these reports are intended to be defined in "INC Thousands Block Pooling Administrative Guidelines" that SPs submit, or are they reports that should be generated by the PA.

- 3.18 This section is very vague on explaining what the requirements are for transitioning from state trials to national thousand number pooling, and what authority the PA will have to obtain required data from state trials.

Appendix A

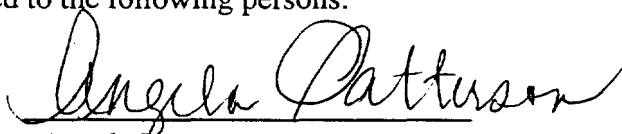
- NANC This section states that the NANC "...selects the administrator..." Telcordia recommends that it be corrected to state that the FCC selects the pooling administrator.

Appendix B

The document "NANC Functional Requirements Specifications, Delta Document for National Number Pooling" should be added to the reference document list since it is cited in section 2.17.3.

CERTIFICATE OF SERVICE

I, Angela Patterson, hereby certify that on this 25th day of September, 2000 copies of the foregoing Comments of Telcordia Technologies, Inc. in CC Docket 99-200, were served, via first-class, U.S. mail or hand delivered to the following persons:


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